

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
v. § CRIMINAL NO. 19-147
§
CYRUS ALLEN AHSANI, and §
SAMAN AHSANI, §
§
Defendants. §

UNOPPOSED MOTION TO CONTINUE SENTENCING

TO THE HONORABLE VANESSA GILMORE:

The United States, by and through Jennifer Lowery, Acting United States Attorney, and Joseph S. Beemsterboer, Acting Chief of the Fraud Section of the Criminal Division of the United States Department of Justice, and Suzanne Elmilady, Assistant United States Attorney, and Gerald M. Moody, Jr. and Jonathan Robell, Assistant Chiefs, hereby submits its Unopposed Motion to Continue Sentencing.

1. Defendants Cyrus Ahsani and Saman Ahsani pleaded guilty to conspiracy to violate the Foreign Corrupt Practices Act (FCPA) on March 25, 2019, pursuant to a plea agreement with the United States. [REDACTED]

[REDACTED]

[REDACTED]

2. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Defendants are both released on bond.

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. Therefore, the United States seeks a continuance of defendants' sentencing until December 2021, at a time most convenient for the Court.

9. The United States has conferred with U.S. Probation and counsel for the defendants, and they have indicated they are unopposed to a continuance.

THEREFORE, the United States respectfully requests that this Unopposed Motion to Continue Sentencing be granted.

JENNIFER LOWERY
Acting United States Attorney
Southern District of Texas

JOSEPH S. BEEMSTERBOER
Acting Chief, Fraud Section
Criminal Division
U.S. Department of Justice

BY: /s/ _____
SUZANNE ELMILADY
Assistant United States Attorney
1000 Louisiana, Suite 2300
Houston, Texas 77002
713-567-9574 (ph)

BY: /s/ _____
GERALD M. MOODY, JR.
JONATHAN ROBELL
Assistant Chiefs
1400 New York Ave, NW
Washington, DC 20005
202-616-4988 (ph)

CERTIFICATE OF CONFERENCE

On July 14, 2021, the United States conferred with defense counsel, Rachel Talay, regarding this motion and she is unopposed to this motion for continuance and its filing.

/s/Suzanne Elmilady
/s/Suzanne Elmilady
Suzanne Elmilady
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

On July 14, 2021, the United States filed this Unopposed Motion for Continuance under seal and provided a copy to U.S. Probation and defense counsel, Rachel Talay.

/s/Suzanne Elmilady
/s/Suzanne Elmilady
Suzanne Elmilady
Assistant U.S. Attorney